

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

\$33,470.00 in United States currency,
\$512.00 in United States currency,
Defendants *in Rem*.

Civil No.:

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

TYO THE HONORABLE COURT:

COMES Now, the United States of America brings this Verified Complaint for Forfeiture *In Rem* under Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action *in rem* brought pursuant to:
 - a. 21 U.S.C. § 881(a)(6) (authorizing civil forfeiture of proceeds of sales of controlled substances and money intended to be exchanged for controlled substances);
 - b. 18 U.S.C. § 981(a)(1)(A) (authorizing civil forfeiture of property involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956, 1957, and 1960);

- c. 18 U.S.C. § 981(a)(1)(C) (authorizing civil forfeiture of property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity”);

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 21 U.S.C. § 881(6) and 18 U.S.C. §§ 981(a)(1)(A) and (a)(1)(C).
3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendant pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

The Defendant *in Rem*

4. The Defendants *in Rem* are \$33,470.00 in United States currency seized on February 20, 2024 at Condominio Estancias del Rey, Building 8, Apartment 805, Caguas, Puerto Rico, owned by Glenda Irizarry Campos. On the same date, February 20, 2024, \$512.00 was seized from Glenda Irizarry-Campos’ vehicle, a BMW X4, inside a white Prada Bag.
5. The Defendants *in Rem* are within the possession, custody, or control of the United States.

FACTS

6. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Task Force Office Alexander Arroyo-Fuentes of the Federal Bureau of Investigation.

CLAIM FOR RELIEF

The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendants *in Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendants *in Rem* condemned and forfeited to the United States of America for disposition according to law and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this day of 2024.

W. STEPHEN MULDROW
United States Attorney

/s/Frank Norris
Frank Norris
Special Assistant United States Attorney
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DECLARATION

I, Frank Norris, Special Assistant U.S. Attorney, for the District of Puerto Rico, declare under penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the United States Federal Bureau of Investigation (“FBI”); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 29th day of July 2024.

/s/Frank Norris

Frank Norris

Special Assistant United States Attorney

VERIFICATION

I, Alexander Arroyo-Fuentes, depose and say that I am a Task Force Officer with the Federal Bureau of Investigation and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 29 day of July 2024.



Alexander Arroyo-Fuentes,
Task Force Officer
Federal Bureau of Investigation (FBI)

